

StoneX Group Inc.
**Whistleblower Policy and
Procedures**

AMENDED ON NOVEMBER 13, 2012

AMENDED ON DECEMBER 8, 2015

AMENDED ON MAY 20, 2016

AMENDED ON FEBRUARY 25, 2020

AMENDED ON AUGUST 1, 2020

AMENDED ON MAY 18, 2022

LAST AMENDED JANUARY 31, 2024

1. Definitions of terms used in the Whistleblower Policy & Procedures:
 - a. the **Company**: StoneX Group Inc. and its subsidiary companies;
 - b. the **Code of Ethics**: the Company's Code of Ethics, a copy of which is available on the corporate website, www.stonex.com, under Investor Relations/Governance;
 - c. **Potential Breach**: a potential or suspected breach of any law or regulation to which the Company or its employees may be subject, or a potential or suspected breach of the Code of Ethics or other applicable policies;
 - d. **Report**: a report made of a Potential Breach in accordance with paragraph 4 below;
 - e. **Reporter**: the person who has made a Report of a Potential Breach.
2. The Company is committed to conducting its businesses in accordance with ethical practices and in compliance with all relevant laws and regulations. The Company therefore expects all of its employees, globally, to abide by the Code of Ethics and act in accordance with laws and regulations governing their activities. This Whistleblower Policy & Procedures reinforces procedures for the detection and reporting of corporate and employee misconduct, as part of the Company's determination to maintain a robust compliance program.
3. The Company requires employees (other than those who have an existing obligation to prevent, detect and report potential breaches) who reasonably believe they have knowledge of any Potential Breach by the Company or any of its employees or representatives to make a Report as directed below. The Company also encourages non-employees such as consultants, employees of the Company's guaranteed introducing brokers and tied agents to report any Potential Breach as directed below.
4. Any director, officer or employee who becomes aware of any existing or potential financial fraud or behavior which violates the Company's Code of Ethics should promptly notify, in the case of employees, the Company's Corporate Secretary and, in the case of directors and officers, the Chairman of the Nominating & Governance Committee.

Alternatively, any issue may be reported through our secure whistleblower website at <https://secure.ethicspoint.com/domain/media/en/gui/34806/index.html>.

5. The Report should be made as soon as possible after the Reporter becomes aware of the Potential Breach. This will enable the Company to investigate the Potential Breach more effectively and take the necessary action promptly, perhaps reducing the amount or even possibility of adverse consequences.

6. The Report should provide sufficient detail to enable the Company to make a proper and thorough assessment of the Potential Breach and carry out the appropriate action.
7. The Company prohibits retaliation against employees, customers or vendors under any of the following circumstances: (a) for raising a question or concern, in good faith, about a Potential Breach; (b) for reporting, in good faith, any Potential Breach through any of the Company's reporting channels; (c) for exercising their legal right to communicate a Potential Breach to the Company or a governmental agency or authority or self-regulatory organization; or (d) for cooperating with or participating in any investigation or proceeding conducted by the Company or a government agency or authority or self-regulatory organization. Any employee who attempts (directly or indirectly) to intimidate or retaliate against anyone who makes such a report will face disciplinary action, up to and including termination of employment. This is also reflected in the Company's employment policies.
8. A Report made promptly and in good faith, and that leads to exposure of a breach of law, regulation, or the Code of Ethics invariably helps the Company. For example, it may reduce the amount of or potential for financial loss; it may reduce the Company's exposure to fines or other penalties; it may reduce the Company's exposure to lawsuits. It will always help the Company in its determination to 'play by the rules', and to maintain its reputation for doing so. Accordingly, a Report will be viewed favorably by the Company.
9. An employee who is found to have acted falsely or maliciously by reporting a Potential Breach when there have been no reasonable grounds for having done so, will be subject to disciplinary procedures. This does not mean that a report of a Potential Breach that turns out not to have been a breach of any law, regulation, or the Code of Ethics will result in disciplinary action. It means only that an employee reporting a Potential Breach should do so in good faith.
10. Employees are prohibited from sharing information relating to a potential breach with the media or any other person or entity outside the Company, except as expressly set forth in paragraph 13. It is especially important that any report should be subject to legal privilege. Reporting a Potential Breach as prescribed under paragraph 4 above will ensure that legal privilege is maintained over such Report.
11. Upon receipt of a Report, the Company will promptly investigate and evaluate the alleged breach. If indeed a breach is found to have occurred, or is ongoing, the Company will respond appropriately. Responses may include remedial steps to prevent further breaches, disciplinary steps against employees concerned and self-reporting to the relevant regulatory or prosecuting authorities.

12. The current head of the Company's legal department shall make a report every quarter to the Company's Audit Committee of any Report received during the prior quarter, and describe what investigative and remedial steps have been taken as a result.

13. Nothing in this Whistleblower Policy & Procedures is intended to or shall prevent or limit Employee from: (i) communicating with, reporting possible violations of law or regulation to, making lawful disclosures to, filing a charge or complaint with, providing documents or information voluntarily or in response to a subpoena or other information request to, or participating in or cooperating with an investigation, proceeding or other action conducted by or brought before the Securities and Exchange Commission, the U.S. Department of Labor, the U.S. Department of Justice, the Equal Employment Opportunity Commission, the National Labor Relations Board, or any other any federal, state or local government agency or authority or self-regulatory organization charged with enforcement of any or regulations; (ii) testifying truthfully in the course of any administrative or legal proceeding; or (iii) providing truthful and accurate information in response to inquiries from the Company's government regulators, or in response to lawfully issued enforceable legal process or an enforceable court order. ("Employee's Protected Rights"). Nor shall anything contained in this Whistleblower Policy & Procedures or in any other Company policy, procedure, guideline, handbook, code, agreement or other document require Employee to notify or obtain prior approval of or authorization from the Company with respect to any of the Employee's Protected Rights or before exercising any of the Employee's Protected Rights.
